



UNITED STATES ENVIRONMENTAL PROT
Office of Air Quality Planning and S
Research Triangle Park, North Carolin.

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OAQPS AIR
DOCKET CONTROL ROOM

Mr. W. M. Reiter
Director
Pollution Control
Allied Corporation
Post Office Box 2332 R
Morristown, New Jersey 07960

Dear Mr. Reiter:

This letter is to confirm the visit of Mr. Doug Bell and Mr. David Beck of the Environmental Protection Agency (EPA), and Mr. Buddy Newman and Mr. Tim Smith of Energy and Environmental Analysis, Inc. (EEA), to the Allied phenol/acetone (from cumene) plant at Frankford, Pennsylvania, on November 17, 1981. Mr. David Beck of EPA discussed this visit with you in recent telephone conversations.

As you know, the EPA is in the process of developing standards of performance for distillation operations in refineries and the synthetic organic chemical manufacturing industry (SOCMI) in accordance with Section 111 of the Clean Air Act as amended, August 1977. These standards will not apply to existing facilities except when they are substantially modified or reconstructed. The Act requires that the standards be based on "... best technological system of continuous emission reduction which (taking into account the cost of achieving such emission reduction and any non-air quality health and environmental impact and energy requirements) the Administrator of EPA determines has been adequately demonstrated."

We are interested in discussing distillation emissions, design and operating parameters affecting emissions, control of distillation emissions, and our intended approach to writing a possible new source performance standard. Enclosure 1 contains a more detailed list of the technical topics for discussion. In addition, Enclosure 2 consists of a briefing package used in a previous meeting with CMA representatives on the distillation project. The briefing package hopefully will give you some background on the regulatory analysis done to date and on the possible format of a regulation. Enclosure 3 is a copy of our national emissions data for distillation operations. Estimates of regulatory impacts will be made using these data.

The authority for EPA's information gathering and source testing is included in Section 114 of the Clean Air Act (42 U.S.C. 7414). Enclosure 4* contains a summary of this authority. If you believe that disclosure of the information we request would reveal a trade secret, you should clearly identify such information as discussed in the enclosure. Any information subsequently determined to constitute a trade secret will be

protected under 18 U.S.C. 1905. If no claim of confidentiality accompanies the information when it is received by EPA, it will be made available to the public by EPA without further notice (40 CFR Part 2.203, September 1, 1976). All emission data, however, will be available to the public.

As noted in Enclosure 5*, EPA has designated EEA an authorized representative of the Agency. Therefore, EEA has the rights discussed above and in Enclosure 4. As a designated representative of the Agency, EEA is subject to the provisions of 42 U.S.C. 7414(c) respecting confidentiality of methods of processes entitled to protection as trade secrets. The EEA Contract with EPA is Number 68-02-3061.

Enclosure 6* summarizes Agency and Emission Standards and Engineering Division policies and procedures for handling privileged information and describes EPA contractor commitments and procedures for use of confidential materials. It is EPA's policy that compliance by an authorized representative with the requirements detailed in Enclosure 6 provides sufficient protection for the rights of submitters of privileged information.

The following policies concerning liability should also be of interest to you:

1. If a Federal employee is injured in the course of his employment, he has compensation coverage from the Government under the Federal Employees Compensation Act (5 U.S.C. 8108 et seq.); and

2. If, due to the employee's negligence, property damage or personal injury to third parties occurs, the Federal Tort Claim Act (28 U.S.C. 1346) provides a means of fixing any liability upon the Federal Government.

The Office of General Counsel, EPA, has informed the Agency that a firm may not condition EPA's "right of entry" upon consent to a waiver of liability and has instructed employees not to sign such waivers. If you have any questions regarding this refusal, please contact Mr. Donnell L. Nantkes, Office of General Counsel, at (202) 426-8830.

After the plant visit, a confidential trip report will be prepared by EEA, which will be sent to you and EPA. If you find any information which you deem confidential, the trip report will then be revised, and all confidential information will be excluded.

If the date of this visit becomes impractical or you have any questions, please call Mr. David Beck at (919) 541-5564.

THIS ENCLOSURE MAY BE
INCLUDED IN DOCKET ITEM:

4,5+6

II-C-65

6 Enclosures

Sincerely yours,

Jack R. Farmer, Chief
Chemicals and Petroleum Branch
Emission Standards and
Engineering Division

ENCLOSURE 1

TOPICS OF DISCUSSION FOR PLANT VISIT TO ALLIED CHEMICALS

I. DEVELOPMENT OF NSPS-DISTILLATION

1. The approach
2. The available data
3. The assumptions
4. The format of the regulation

II. DISTILLATION OPERATIONS

1. Selection of operating conditions such as batch/continuous, vacuum/nonvacuum, and flash/fractionating
2. The existing distillation units affected by the standard due to reconstruction and modification criteria

III. EMISSIONS

1. Availability of any additional data/discussion of existing data base
2. Dependency of emissions on operating conditions
3. Fluctuations in flow and concentrations of noncondensables exiting the distillation unit
4. Emissions from batch distillation unit
5. Means available to measure low flow and low concentrations
6. Accuracy of design calculations to predict flows and concentrations exiting distillation units

IV. COMBUSTION CONTROL EQUIPMENT

1. Flares - safety aspects
2. Boilers - corrosion problems
3. Incinerators - feasibility

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NATIONAL EMISSIONS PROFILE

LAST UPDATE: 10/20/2011

CD	PLNT NO	COL	PR	FIRL	OFR	DIST	FLWY	BLDZ	QTY	SCFM	L/H/LR	ZINC	XCO	ZN	ZI	ZC1	UNKN
74	9999	HGH	1	V	CON	ATM	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
74	USS HCH	4	NV	CGR	ATM	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
74	4553 HCH	1	NV	CON	ATM	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
74	USS FCP	1	V	COR	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
74	USS HCH	2	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
71	CHEV RCA	2	NV	CON	NOR	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000
71	CHEV RCA	3	V	CON	INC	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
72	KO CIL	1	V	CON	INC	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000
72	KO CIL	1	V	CON	INC	CNT	FRC	0.500	0.502	0.011	5.000	100.000	053.30	000.00	025.70	020.00	000.00
72	SITF ELIL	1	V	CON	ATH	CNT	FRC	9.500	0.690	0.042	7.00	019.20	034.10	029.30	017.00	012.60	000.00
72	SITF ELIL	1	V	CON	ATH	CNT	FRC	11.790	6.72	0.000	1.90	027.20	039.30	025.70	019.60	015.40	000.00
72	USS NIFA	1	V	CON	INC	BTN	FRC	13.200	0.679	004.100	0.000	013.70	029.00	037.00	019.50	019.50	000.00
72	80SF XAJ	2	V	CON	INC	CNT	FRC	27.000	5.05	100.000	17.90	29.50	14.70	42.00	13.80	0.00	3.70
72	UC STX	1	NV	CON	NON	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
72	9999 RTX	2	NV	CON	NON	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	026.70	020.00	000.00
74	NS HIL	1	NV	CON	NON	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	026.70	020.00	000.00
74	NP MIL	1	NV	CON	RCL	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000
74	PN STX	2	NV	CON	NON	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000
74	BFG CCKY	2	NV	CON	NON	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000
74	RTX	2	NV	CON	NON	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000
74	ARCO CYTX	2	NV	CON	NON	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000
75	OH TCTX	1	V	CON	RCL	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000
75	OM TCTX	1	V	CON	NON	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000
75	OM TCTX	2	V	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
75	OM TCTX	2	V	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
75	MNS TCTX	2	V	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
75	ELPS OTDX	2	V	CON	FLR	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
75	ELPS OTDX	2	NV	CON	ATH	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000
75	GULF STLA	2	V	CON	ATH	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000
75	GULF STLA	1	V	CON	ATH	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000
75	GULF STLA	3	V	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
75	ELPS OTDX	2	V	CON	FLR	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
75	AM DAL	1	NV	ARS	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
76	NP CFCN	1	NV	CON	NON	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000
76	NP OTIN	1	NV	CON	NON	CNT	FRC	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000	000.000
76	SCE CSC	1	NV	SCR	ATH	CNT	FRC	2.500	0.14	0.01	1.900	0.006	0.0	0.000	0.000	0.000	0.000
76	SCE CSC	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	0.020	0.016	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999	999.999
77	SCG LGA	1	NV	CON	ATH	CNT	FRC	999.999	999.999	9							

NATIONAL EMISSIONS PROFILE

LAST UPDATED: 10-20-01

WITNESS STATEMENT

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A B C D E F G H I J K L M N O P Q R S T U V W X Y Z		ABBREVIATION KEY
9999=	DEFAULT VALUE= INUFFICIENT DATA	
00000=	DEFAULT VALUE= NONCONDENSABLE EXITING DISTILLATION UNIT ARE RECYCLED OR	
	NO ACTUAL EMISSIONS	
CHE=	CHEMICAL IDENTIFICATION NUMBER	
999=	CONFIDENTIAL	
000=	INDISTINGUISHABLE PRODUCT(S)	
MTR=	CHENICAL MANUFACTURER	
A=	CONFIDENTIAL	
PLNT LOCN=	PLANT LOCATION	
YSE=	LOCATED IN A STATE WITH SIP	
NS=	LOCATED IN A STATE WITHOUT A SIP	
NO_COL=	NUMBER OF DISTILLATION COLUMNS	
COL_CND=	COLUMN CONDITION	
VAC=	VACUUM	
NV=	NON-VACUUM	
COA=	CONFIDENTIAL	
PR_EQUP=	PRODUCT RECOVERY EQUIPMENT	
COND=	CONDENSER	
SCUB=	SCRUBBER	
ABCD=	ABSORBER	
FIML_CRTL=	FINAL EMISSION CONTROL EQUIPMENT	
ATIME=	EMISSION VENTED TO ATMOSPHERE	
FLRE=	FLARE	
THRC=	THREE INSPECTORS	
BRTR=	ROTTER	
HOLE=	NO EMISSIONS FROM THIS COLUMN	
OPR_MODE=	OPERATING MODE	
CONTINUOUS		
BATT=	BATCH	
DIST_TYPE=	DISTILLATION TYPE	
FRC=	FRACTIONATING DISTILLATION	
ELUE=	FLASH DISTILLATION	
FLOW_SCM=	FLOW OF PROCESS VENT STREAM	
REFLUXE=	HEAT CONTENT	
VOC_LBNG=	VOC FLOW	
ZVOC=	VOC CONCENTRATION	
ZC=	CARBON CONTENT	
ZN=	NITROGEN CONTENT	
ZH=	HYDROGEN CONTENT	
ZO=	OXYGEN CONTENT	
ZCL=	CHLORIDE CONTENT	
ATOM_RMT=	HYPOTHEICAL NUMBER OF ATOMS PER ANTOXIDE MOLECULE	